

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

KRISTEN SLUYSKI, individually
and
on behalf of all others similarly
situated,

Plaintiff,

v.

AMERICAN GENERAL LIFE
INSURANCE COMPANY,

Defendant.

Civil Action No. 18-10411-PBS

PLAINTIFF'S MOTION TO AMEND COMPLAIN

Plaintiff Kristen Sluyski ("Sluyski") hereby moves the Court to allow the Plaintiff to amend the original complain according to F.R.C.P. 15(a)

Plaintiff filed this action in state court against AGLI on December 8, 2017. Plaintiff's Complaint asserts claims on behalf of Plaintiff in her individual capacity and on behalf of a putative class of individuals "who (a) reside in a Class State ... and (b) as a result of AGLI's failure to properly calculate and include interest on proceeds paid after statutory prompt payment deadlines, have not been paid the full death benefits to which they were entitled under a life insurance policy issued by AGLI or any of AGLI's predecessors" See ECF No. 1.

1. The Plaintiff would requests that the Court allow until Monday June 25, 2018 to file the amended complaint.

2. This request is made in good faith and is not interposed for the purpose of delay.

WHEREFORE, Sluyski respectfully requests that this Court grant its motion

Respectfully submitted,

Kristen Sluyski ,

By her attorney,

/s/ Mark B Ryan

BBO # 665310

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LOCAL RULE 7.1 CERTIFICATION

I, Mark B Ryan, hereby certify pursuant to Local Rule 7.1 that, by electronic mail on March 27, 2018, I requested

Defendant's assent to this motion by and through their counsel. By telephone mail, Defendant's counsel assented to

this motion on behalf of Defendant.

Dated: June 19, 2018

/s/ Mark B Ryan

CERTIFICATE OF SERVICE

I, Mark B Ryan, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this date.

Dated: June 19,2018

/s/ Mark B Ryan